



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF



June 2, 2017

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012

Dear Supervisors:

DEVELOPMENT OF A PLAN TO IMPLEMENT BODY WORN CAMERAS

Thank you for your support and the opportunity to provide a thoughtful and deliberate consideration in developing a plan to implement body worn cameras (BWC) for Los Angeles County. The Los Angeles County (County) Sheriff's Department (Department) has convened two countywide working groups comprised of a number of specialists in law enforcement, technology and data systems, police oversight, and criminal defense and prosecutions. We have studied best practices of numerous other policing agencies, including those who have deployed BWC technology. We continue to benefit from the lessons learned by police and local governments across the country, including a significant discovery that technology alone does not guarantee a conclusive finding of fact in every review of a dynamic recorded call for service.

While we face these challenges, I stand in agreement with the Honorable Board, other elected officials, and law enforcement leaders throughout the nation in the belief that equipping law enforcement officers with BWC can still further improve trust and confidence in the communities we serve. This opportunity also conveys a deep responsibility to consider all aspects and implications of deploying BWC technology that go beyond the deployment of a video recording device.

The introduction of BWC technology into the criminal justice system will fundamentally transform the manner in which we perform our duties. Indeed, BWC will enable law enforcement to collect better, more objective evidence for criminal investigations, provide law enforcement agencies greater ability to review its performance and practices, and provide the public an opportunity to engage in an important discussion about law enforcement actions and crimes that garner interest.

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Moving forward, the opportunity today is for the County to judiciously consider the more complex details of the nation's largest Sheriff's Department's deployment of BWC technology. We must ensure this is done in a manner that meets the expectations of our public for police accountability, while increasing the integrity of the evidence discovery and the potential ability for triers of fact to personally witness incidents, word for word, as the law enforcement officer saw and heard it.

How we capture, store, secure, analyze, interpret, and share the video will have a direct correlation to the integrity and credibility of our criminal justice system.

For most of us, we equate new technology with faster processes and time savings. However, BWC video creates an entire new workload for law enforcement.

BWC technology easily enables us to capture a higher level of detail from all law enforcement interactions and record statements from any person involved in a criminal investigation. This will result in an increase in evidence for each investigation. With the ability to collect better and more evidence through BWC recordings, comes the obligation to review the additional video evidence in an attempt to hold those guilty of committing crimes accountable and freeing those who are innocent of crimes. In order to fulfill this obligation and properly implement such a program, additional investigative personnel will be required for the Department.

BWC technology will provide law enforcement supervisors and managers the opportunity to review the performance of their staff through random auditing and evaluation following critical incidents. The Department presently performs thorough examinations of all critical incidents such as any use of force, vehicle pursuits, foot pursuits, citizen complaints, claims of damages, lawsuits or any other action that places the Department or its members in a position of risk of injury or other loss. These review processes will benefit from the addition of multiple videos from each incident, and like criminal investigations will also create a new workload for all involved.

The Department has made great strides in modernizing its practices and in order to continue with our thorough review processes, will require additional supervisory positions to review the new videos associated with each incident.

I have made it known for more than two years that any implementation of BWC for the Department will include a path for the public to obtain BWC video. Most California law enforcement agencies utilize the current protections afforded by state law that allow BWC videos to be classified as evidence, thus denying the release of any video. It is my intent to provide a path that conforms to current state law for the public to request access to videos through a formal process. This process will also create another new workload. Facilitating access to BWC video will require additional personnel to review video, determine if it is evidentiary to an active investigation, redact audio or video that

June 2, 2017

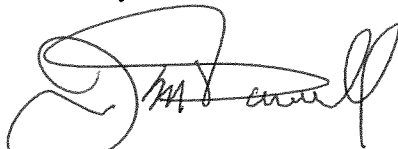
captures information that is not eligible for release, and complete the request for the video. Even as we continue to work on this process, new questions about the release of video to the public are being raised by civil rights groups who once advocated for the public access to these videos.

In the accompanied attachment, you will find the requested plan for implementation. We have developed a four-year plan, which will address BWC implementation as a phased approach. Implementation of the BWC program for the Department will require the purchase of 5,895 BWC, annual service costs for video storage, infrastructure upgrades, and an additional 239 positions. This will roughly translate into an annual cost of approximately 55 million dollars upon full deployment.

My staff, with the collaborative help of our County partners, worked incredibly hard to prepare this comprehensive report. I am honored and pleased to present it to the Honorable Board. It is a comprehensive and detailed plan that allows us to discharge our duty in a fair manner that provides each member of our community their right to procedural justice.

I look forward to working with the Honorable Board on the next steps toward implementation of a comprehensive BWC program for the County.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim McDonnell", written over a horizontal line.

JIM McDONNELL
SHERIFF



Body Worn Camera Plan

Presented by:
Sheriff Jim McDonnell
The Los Angeles County Sheriff's Department

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Introduction

On July 12, 2016, the Board of Supervisors requested the Sheriff to report back with a body worn camera plan within 120 days. The Board's motion stated, "A plan to implement body-worn cameras in the shortest timeframe possible and in a manner that makes best use of partnerships with other agencies, including the Los Angeles County District Attorney's Office, the Los Angeles Police Department, the Office of Inspector General, the Public Defender, and the Alternate Public Defender." In order to accomplish this task, the Sheriff's Department was given an extension in order to further evaluate policy issues which would impact staffing and the proposed budget.

In response to the Board's motion, LASD organized a Countywide BWC Implementation Workgroup consisting of justice partners from the Los Angeles County District Attorney's Office (LADA), Public Defender (PD), Alternate Public Defender (APD), Probation, Office of Inspector General (OIG), Chief Executive Officer (CEO), CEO Chief Information Officer (CIO), Internal Services Department (ISD), Information Services Advisory Board (ISAB), County Counsel, Countywide Criminal Justice Coordination Committee (CCJCC), Superior Court and Los Angeles Police Department (LAPD). The workgroup was further divided into three separate subcommittees consisting of Fiscal, Technical, and Policy, which met regularly and reported progress to the Countywide BWC Implementation Workgroup.

Research

Early on, the Los Angeles County Sheriff's Department recognized the importance of the BWCS technology and worked with ISD Purchasing & Contract Services Division (PCS) on releasing "Request for Information" bid # RFI-IS-142001-1, for a no-cost Test & Evaluation (T&E). LASD selected four different manufacturers' products to test between September 2014 and March 2015. This provided the opportunity to test different cameras, video file management software, and cloud-based storage solutions. One patrol station from each of the four LASD Patrol Divisions participated in the T&E.

The BWCS T&E concluded in March 2015. Following the T&E, and prior to the Board of Supervisor's motion, LASD facilitated focus group discussions with the personnel that participated in the BWCS T&E. These group discussions included representatives from the OIG and LADA. This led to the foundation for LASD to create preliminary BWC specifications for a future procurement. In addition, the LASD created and led a Public Safety BWC Collaboration Group (different than the Countywide BWC Implementation Workgroup mentioned above) consisting of Los Angeles County police agencies, California Highway Patrol, Los Angeles County District Attorney's Office, Los Angeles City Attorney's Office, and the Los Angeles County Probation Department. This group discusses BWC policies, products, and individual agency deployments. Further, LASD worked closely with other law enforcement agencies, researched relevant emerging BWC technology, and closely collaborated with OIG, LADA, Probation, and ISAB. LASD has kept abreast of constant improvements in BWC technology and other agency's BWC implementations.

Moreover, the Sheriff's BWC team has conducted extensive research and attended several body worn camera training events since 2014 to keep informed of the latest and emerging BWC technology. Members of the Sheriff's BWC team attended the following events:

- International Association of Chiefs of Police (IACP) Conferences, in 2014, 2015 and 2016
- IACP Law Enforcement Information Management Conference (San Diego, CA)
- California Public Records Act training course (San Bernardino, CA)
- California District Attorneys Association National Body Camera & Technology Summit, (Anaheim, CA)
- Peace Officers Standards and Training (POST) Body Worn Camera Patrol Officer Course (San Diego, CA)
- POST Body Worn Camera Management Course (San Diego, CA)
- Force Science Body Worn Camera, (Chicago, IL)
- Major City Chiefs and County Sheriff's Body Worn Camera - Building a Secure and Manageable Program for Law Enforcement Course, in Washington D.C.
- Bureau of Justice Assistance (BJA) Body-Worn Toolkit Expert Panel (Washington, D.C.)
- California State Sheriff's Association Body Worn Camera Panel (Sacramento, CA)

The results of the BWCS T&E and the subsequent research has enabled the LASD to develop an understanding of the policies, needs and challenges of body worn camera programs in effect by other law enforcement agencies throughout the nation.

New Workloads

The Los Angeles County Sheriff's Department has identified several new workloads with the creation of a body worn camera video program. These new workloads will require additional personnel in order to implement a BWC program for this Department. The impacted areas include the additional work by uniformed patrol deputies and handling case detectives for criminal investigations, supervisors performing administrative reviews, digital evidence management and video forensics.

Criminal Investigations

Criminal investigations typically begin when a uniformed patrol deputy responds to a call for service or conducts a self-initiated action (traffic stop or pedestrian stop). In these instances, multiple deputies are commonly at the same scene. These incidents often result in open charge arrests or the initiation of an active investigation.

The patrol deputy must document the incident in the form of a criminal report, and submit it to their supervisor for review and approval. After review of the written report, the supervisor assigns the investigation to an investigative unit, either a patrol station detective bureau, or a specialized bureau within the Detective Division.

Presently, LASD detectives are required to conduct a thorough review of all written crime reports to examine the facts of the case, examine physical evidence, crime laboratory reports, and crime scene photographs to ensure the investigation was correctly completed, and appropriate person(s) are identified as perpetrators. Detectives must perform any additional investigation required; attempt to resolve conflicting statements; identify and collect additional evidence; ensure proper investigative procedures were followed; and present a completed case to the District Attorney's Office for filing of criminal charges.

The LASD anticipates a significant increase in workload for detectives with the introduction of body worn camera video evidence. Detectives will additionally be responsible for identifying and collecting all body worn camera video evidence captured. This may include body worn camera video captured by assisting law enforcement officers from outside agencies. Detectives will review body worn camera video evidence and ensure the accuracy of the investigation performed before presenting the video evidence to the District Attorney's Office.

Administrative Review Processes

The LASD performs administrative reviews resulting from a multitude of events, including: Any use of force, obstruction arrests, service complaints, traffic collisions, vehicle pursuits, foot pursuits, civil claims, law suits, personnel injuries, and significant incidents necessitating review. BWC videos will provide the administrative reviewer an increased ability to determine legality, policy adherence, and performance. This will also add an exorbitant amount of time to this process.

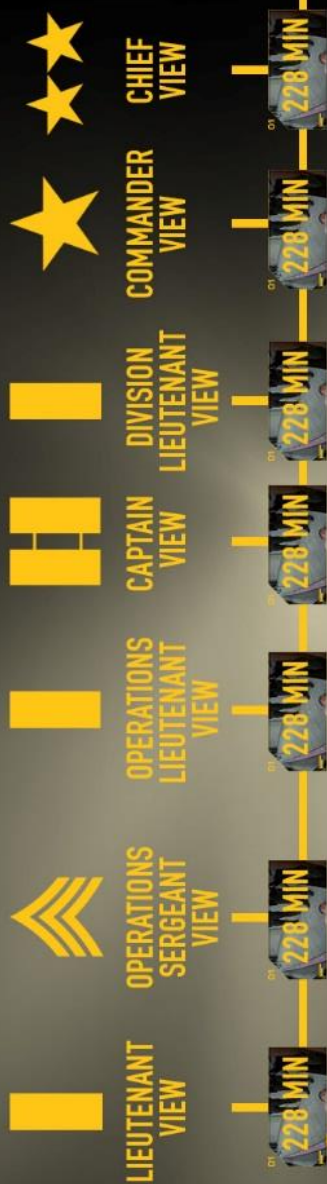
Presently, supervisors who perform these administrative inquiries are required to identify and interview all witnesses, document the incident and scene, interview LASD personnel, review the written reports and interview any suspects. The creation of BWC video will increase the amount of time required to conduct the administrative inquiry and for the involved unit's command staff to complete the review process.

Take for example an incident where nine LASD personnel were on scene during a use of force incident that lasted for just over 25 minutes. If each LASD member was equipped with a BWC, approximately 228 minutes of video evidence would be created. Each video would require individual viewing by the supervisor, as each BWC would capture different angles of the incident, different audio statements, and different recordings of the scene. The illustration that follows on the next page provides additional visual details about the entire review process.

Critical incidents, such as deputy involved shootings, significant uses of force resulting in hospitalization, and in-custody deaths would be investigated by the Internal Affairs Bureau and additionally reviewed through the rank of division chief, as well as other internal and external review committees. The creation of body worn camera video would add additional workloads to these entities as well.



BODY WORN CAMERA PROJECT



228 MIN

228 MIN

228 MIN -

PUBLIC DEFENDER VIEW

DISTRICT ATTORNEY
VIEW

**DETECTIVE
VIEW**



Digital Evidence Management

Body worn camera videos will create an exorbitant amount of digital video evidence which must be collected, cataloged, and retained. In order for these records to be efficiently retained and retrieved, patrol deputy personnel will be required to enter additional meta-data associated with each video file during the course of their work day. On occasion, BWC videos may be ingested into the digital video management software system and stored without the proper meta-data. As other law enforcement agencies have experienced, management personnel will be required to perform audit reports and ensure corrective actions are taken and the records are properly updated.

The LASD anticipates public records requests for body worn camera videos. This new workload will require personnel to review video and determine evidentiary significance. The video will be redacted to prevent the release of evidence or confidential records.

Personnel responsible for managing digital evidence will be needed to assist for records requests resulting from civil proceedings, additional criminal proceedings, administrative requests, and provide expertise for proceedings regarding the chain of custody for digital evidence.

Video Forensics

Based on known limitations and distortions which occur in video recordings, the LASD will designate select body worn camera personnel to participate and complete a certificate program for becoming a video evidence specialist.

The certified video evidence specialist personnel will be capable of reporting distortions in videos to detectives, supervisors and executives. Distortions can be caused by changes in frame rate due to lighting conditions, lens distortions, resolution distortions, audio distortions based on distances between the camera and the incident, and compression distortions, such as events overlaying one another on a video even though they happened at different points in time. These distortions are all capable of altering the viewer's perception of the video and impact the outcome of an investigation. The specialist will also be able to demonstrate any video limitations in court and in administrative proceedings. This certification is an emerging field in law enforcement and has generally been outsourced. The implementation of a body worn camera system for the LASD will require this expertise to be internalized, as the cost of outsourcing services will become cost prohibitive, particularly with the amount of critical incident reviews the LASD faces each year.

BWC Policy

County Department Policy

Impacted County Departments held several meetings to develop a roadmap for BWC workflows. The Departments will enter into an MOU outlining the agreed workflows, policies, security and privacy obligations. An MOU and agreed policies will be developed by department representatives.

As instructed in the Board of Supervisor's motion, LASD formed a policy subcommittee with our County justice partners. The subcommittee agreed each County Department using BWCs, or reviewing BWC video files should develop their own policies to meet their department's needs. All departments agreed to utilize the Federal CJIS standard for security. All departments concurred evidence handling will be greatly improved by sharing digital evidence as a web link within an email, or through an interface within a Digital Video Management System (DVMS). Further, the subcommittee acknowledges LAPD and other police agencies in Los Angeles County who have implemented a BWC are already sharing digital evidence via a link to justice partners. The Superior Court currently requires physical media (e.g., DVDs, USB drives); however, it is their intent to pursue a policy on accepting digital evidence.

LASD Department Policy

LASD recognizes the importance of a comprehensive BWC policy in place prior to implementation and has conducted extensive research on the subject, including but not limited to the following:

- Police Executive Research Forum for the Office of Community Policing Services, implementing a Body-Worn Camera Program: Recommendations and Lessons Learned (Police Executive Research Forum, n.d.)
- International Association of Chiefs of Police, Body-Worn Cameras Model Policy and Paper (International Association of Chiefs of Police, n.d.)
- Bureau of Justice Assistance, Body-Worn Camera Toolkit (Bureau of Justice Assistance, n.d.)
- Clear Body Camera Report (State of Michigan, n.d.)
- Los Angeles County Sheriff's Department Office of Inspector General Report (Max Huntsman, n.d.)
- Los Angeles Police Commission Comparative Review of Selected Policies, Investigations, and Training on the Use of Force (Los Angeles Police Commission, 2016)

In addition, LASD reviewed BWC policies from police agencies across the nation and established a Public Safety BWC Collaboration Group. Further, the LASD BWC team began meeting with the following stakeholders for their input and recommendations:

- Unions – Association for Los Angeles Deputy Sheriff's (Leeuwen, n.d.)

- Community Groups
- Office of Inspector General (Max Huntsman, n.d.)
- American Civil Liberties Union (American Civil Liberties Union, n.d.)
- Los Angeles County District Attorney's Office
- Other Justice Partners (i.e. Probation Department, Public Defender's Office, etc.)

Key Policy Issues

Although there are several other policy elements which have little or no fiscal impact which are not addressed in this document, there are some policy decisions that will impact the proposed plan. These impacts are outlined below.

Detective Review of Video

As mentioned above in the New Workloads Section, LASD's policy requires detectives to conduct a thorough review of all written crime reports to examine the facts of the case, examine physical evidence, crime laboratory reports, and crime scene photographs to ensure the investigation was correctly completed to ensure that the appropriate person(s) are identified as perpetrators. Detectives must perform any additional investigation required; attempt to resolve conflicting statements; identify and collect additional evidence; ensure proper investigative procedures were followed; and present a completed case to the District Attorney's Office for filing of criminal charges. This requires that detectives sufficiently view video evidence to establish a reasonable belief to support the case closure findings. This review process has a direct impact on staffing levels and ensures procedural justice. (See Appendix B for additional details to see how each station would be impacted if the entire video was reviewed.)

Public Records Act (PRA) Requests

BWC video release must balance privacy rights with transparency, and will be considered on a case-by-case basis. A suspect's due process rights, as well as the victim, witness, and deputy's rights should be considered.

The LASD will provide an avenue for public records requests. LASD will not release evidence in an active criminal, civil, or administrative investigation, in accordance with California public records laws. Exceptions to this protocol will occur only with the approval from the Sheriff or his designee. Recognizing the exorbitant labor and costs involved in redaction, LASD will work with County Counsel in developing a procedure to charge for redaction-related costs. Incidentally, Las Vegas Metropolitan Police Department charges \$48 per hour for redaction costs and provides an avenue for public record requests (LVMPD.com, n.d.). Most police agencies in California treat their BWC video as an investigative record and they will not release any video unless it is for the court, or pursuant to a court order.

Camera Activation and Deactivation

The LASD policy will provide clear direction for the activation and deactivation of the BWC. Incidents will generally be recorded in their entirety, which will directly impact the storage volume of videos and the subsequent review time based on the length of those videos.

Video Retention

Body worn videos will be classified as investigative records until determined otherwise. The LASD must adhere to County business record retention rules and recommendations established by California Assembly Bill 69. Consequently, all BWC video shall be retained for a minimum of 2.5 years to allow for subpoena service, internal notifications, etc. In addition, BWC video associated with a crime must be retained for the statutory retention period of the crime for which the video pertains or for a period required for pending civil litigation holds.

Data Security

The security of the Department's digital evidence is paramount and the Federal Bureau of Investigation's CJIS standard will be followed. LASD will restrict access of BWC video to only those who have a need and right to access it. Mandatory security protocols for the vendor will be specified, as part of the Department's procurement process. LASD will consider only BWCs with secure internal memory storage and data encrypted during transit. The original BWC video recording shall remain unaltered, where any and all modifications occur on a copy of the original. A robust DVMS audit trail shall capture all changes/updates made. LASD will require vendor's immediate notification of any data breach it finds. Only vendor staff with cleared background checks will have access to the data when completing a remediation plan. In the BWC Workgroup committee, CEO and LASD Risk Management personnel recommended the County consider increasing liability insurance to guard against data security breaches.

Audits

The LASD policy will create auditing procedures for the management of digital evidence by the DVMS custodian of records to ensure meta-data is added to all BWC videos for classification, retention and deletion. Further, each units BWC program supervisor will be responsible for auditing compliance of BWC use, activation, deactivation, uploading of data, and correct meta-data. As previously cited, videos will be audited during administrative reviews of critical incidents. The LASD field audit program, which directs the random audits of all field personnel, will include the added step of reviewing BWC video. Finally, the BWC program will be audited as part of the Department's annual command inspection process.

Technology Requirements

LASD studied the information technology requirements of a BWC program and assessed our Department's infrastructure readiness. We led efforts for other County Departments to evaluate their needs and readiness in order to review BWC video files from LASD and all other police agencies within Los Angeles County. Those efforts resulted in new technology requirements that are outlined below.

Body Worn Camera Devices

LASD recognizes BWC technology is rapidly evolving. Any procured device will be required to meet minimum standards for simplicity, durability and efficiency. As described in the Research Section above, a great deal of effort has already been taken to form the requirements of a BWCS. Under current technological capabilities in today's market, LASD desires a BWC solution that includes:

- An internal battery that lasts for the duration of a deputy's tour-of-duty, approximately 12 hours
- A camera unit that has pre-buffering functionality, where 30 seconds of video is captured prior to the deputy activating the start button
- A multi-port docking cradle that downloads video files directly from the camera unit while charging, synchronizing and updating firmware

Digital Video Management and Storage

- A DVMS that is able to collect, categorize, store and track LASD BWC video files and other digital evidence
- A DVMS software and file storage system that has redundancy across two data centers, disaster recovery provisions, file storage scalability that include declining storage costs over time as technology improves, and meets the Federal Bureau of Investigation's Criminal Justice Information System (FBI-CJIS) requirements
- An Interface with LASD's Active Directory, CAD systems, and a County Digital Evidence Management System (DEMS) under ISAB's jurisdiction, which has not been developed

Network Infrastructure

An evaluation of the Department's data network infrastructure has determined that upgrades at all Sheriff's patrol stations will be necessary. This will require new routers, switches and increased bandwidth necessary for an acceptable level of system performance with the DVMS.

ISD conducted a preliminary analysis and provided the CEO with an estimated budget for similar requirements at all other County facilities. As network traffic increases with more agencies implementing BWC programs, ISD will continue to monitor and reevaluate network needs.

Work Stations

LASD will need to replace and/or upgrade desktop computing capability to accommodate BWC functionality. At minimum, purchasing upgraded desktop computers with faster processors, improved graphic cards and increased memory will be required for the staff assigned to review, edit or redact BWC video both at the LASD and other county departments reviewing or editing BWC videos.

New Staffing Requirements

The deployment of a complete BWC program will require significant additional staff in order to successfully implement. Those additions are outlined below.

Body Worn Camera Bureau

The deployment of a BWC program consisting of 5,895 cameras for all patrol stations and specialized patrol operations will require the creation of a new bureau within LASD. The complexity for performing the following responsibilities necessitates adequate technical and support staff.

- Incremental implementation throughout the Department
- Equipment logistics
- Management of DVMS user accounts
- Management of infrastructure and network needs
- Training all personnel on the DVMS software and BWC devices
- Public Record Acts (PRA) requests, which includes the appropriate redaction
- Video forensic analysis
- Management of BWC-related contracts, MOUs, and grants
- Providing a 24/7 Help Desk
- Statistical reporting
- BWC video management, including videos identified for deletion or redaction

The Body Worn Camera Bureau will be a de-centralized operation, with a small component of centrally located operational staff and a larger component of de-centralized support staff assigned at patrol stations and detective bureaus. The BWC Bureau headquarters staffing will require a unit commander, operations and administrative support staff as well as technical experts.

Patrol Stations

The new workloads of a BWCS cannot be accommodated by existing staff and will minimally require the following:

- Additional risk management sergeant positions for administrative review requirements and supervision of the station's BWC program
- Additional detectives for review of BWC video of active investigations
- Additional video specialist positions, at the level of deputy sheriff generalist or a non-sworn equivalent, to serve as a forensic video specialist. Duties will include: Custodian of records; perform training; assist with video identification, retrieval, and review for criminal and administrative investigations; and respond to public records requests. Presently, the County does not have a non-sworn/professional staff position suitable for this description, and LASD would like to create a proposal for the County's consideration for a newly created non-sworn technical position.
- Additional non-sworn clerical and staff positions who will manage the daily operations of the DVMS software, PRA requests, metadata audits, video redaction, and records requests.

Specialized Detective Units

Specialized bureaus within LASD Detective Division are charged with handling significant and complex investigations involving homicides, human trafficking, sex crimes, career offenders, and serial crimes. These criminal cases frequently traverse jurisdictions and involve multiple victims, witnesses, confidential informants and suspects. Due to the nature of these cases, criminal proceedings require detailed preparation in achieving successful prosecutions that typically result in death penalty or life sentences. Added to this responsibility will be the criminal investigations of officer involved shootings for both the LASD and most of Los Angeles County's independent police agencies. Each officer involved shooting will require multiple viewings of each video in its entirety. The bureaus within the Detective Division will require additional investigative personnel in order to maintain the same level of criminal case work with the added work load of body worn camera evidence.

Professional Standards

LASD Internal Affairs Bureau and Internal Criminal Investigation Bureau will be impacted by BWCS, similarly to the specialized detective units, with the addition of adherence to the California Public Safety Officer's Procedural Bill of Rights.

Personnel investigations assigned to these professional standards bureaus typically require extensive documentation and review of evidence. The introduction of body worn camera video evidence will require investigators to review the videos and the video will need to be transcribed.

The Audit and Accountability Bureau (AAB) was created to provide an independent, objective, and thorough analyses designed to assess and improve the Department's policies, procedures, and practices. Due to the broad nature and complexity of the audits AAB performs, every audit in patrol operations will require body worn camera video review. The added workload will require additional personnel.

Information Technology Support

LASD Data Systems Bureau (DSB) provides information technology (IT) support to the Department. LASD's BWC program, as proposed, will add over two hundred new LASD positions throughout the Department. Additional IT staff will be required to support the new personnel and the newly created impacts on the Department's technology infrastructure.

Budget

Based upon the extensive research completed and factoring in the new workloads, technical requirements and staffing requirements, the LASD collaborated with the CEO in order to prepare an estimated budget. The LASD is proposing and has submitted a multi-phase, multi-year BWC project budget encompassing four phases over four years. Pivotal to the success of this plan, we are strongly recommending and requesting a budget reevaluation after the Department's first six stations have been deployed for at least one year to address budget considerations which cannot be known with certainty at this time. Such considerations include adjustment to the staffing needs, risk management impacts (e.g., complaints, use of force, etc.) and changes in the law. LASD will ensure continuous quality improvements as data becomes available to analyze. LASD recognizes technology and laws will continually change and the best way to measure the true impact within the County is by evaluating the BWC workload under real world conditions. LASD defers to the CEO for their preparation of a countywide budget proposal for the Board of Supervisors. Appendix A contains the LASD body worn camera budget summary.

Additionally, the Countywide BWC Implementation Workgroup canvassed the other County Departments for their interest in BWCs. Both the LADA and PD Departments have a current desire to issue BWCs to their investigators. The Probation Department does not presently desire to issue BWCs to their investigators, but may do so in the future.

The proposed budget includes the recent \$999,600 Federal Grant award from the U.S. Department of Justice, which still requires acceptance by the Board of Supervisors and requires the County to match funds. This budget does not include the \$5,000,000 in CEO's PFU budget for body worn cameras, as approved by the Board on September 27, 2016 (Agenda item #26).

Annual Costs

- BWC subscription, DVMS software/equipment license, and vendor support
- Unit Operational Funds
- Office Space
- Training and Travel, Education, Research, Consulting
- Other Third Party Video or Analytic Software
- Increasing Internet Bandwidth from existing contracts with communication vendors

One-Time Costs

- Office Furniture
- Radio Equipment – Sworn
- Body Worn Camera Mounting Accessories
- Upgrading Computers for Video Review
- Station Network Infrastructure (S&S)
- Unit Operation Funds (startup costs)
- Vehicles (Capital Assets)
- Station Power and Wiring Infrastructure Upgrades (Capital Assets)

Body Worn Camera Procurement

The July 12, 2016, Board motion states, *“This Board desires to support a plan to place cameras in the field as soon as feasibly possible.”* The first step is procuring the cameras, DVMS software, storage, and all its peripherals. However, one of the challenging components for expediting body worn cameras in the field is the lengthy procurement process. The Countywide BWC Implementation Workgroup addressed the following procurement options.

1. Sole Source Procurement – Although a viable option, this is fraught with issues of risk and expense and does not comply with nor encourage the spirit of a competitive market. The BWC vendor community is vast and growing and with ever changing technology, and the consensus and recommendation is not to pursue a sole source procurement.
2. Entering into an agreement with a vendor, selected through a competitive solicitation issued by another public agency (a.k.a. “piggybacking”) was also evaluated. LAPD used a similar approach to acquire its BWCs as a professional services agreement. County Counsel attorneys advised that such a piggybacking approach is permissible provided the proposed vendor was selected by the other public agency as a result of reasonable and similar competitive procurement. Similar to the sole source procurement, based on the vast and growing BWC vendor community with ever changing technology, the consensus and recommendation is not to pursue “piggybacking”.
3. Request for Information (RFI) –Releasing a County RFI, recap findings and select vendors who meet the minimum/mandatory requirements, then release an RFP. The consensus and recommendation was that this was not a viable option, as it would take more time than a competitive solicitation to implement a solution.
4. Request for Proposal (RFP) –Releasing a County competitive solicitation by ISD Purchasing Division or LASD Contracts Unit was also evaluated. Since LASD’s BWC acquisition share hold is approximately 95% of County’s entire need, ISD recommends LASD Contracts Unit issue the solicitation and include an option for other County Departments to utilize the bid. LASD Contracts Unit is amenable to issuing an RFP, and the average duration from releasing an RFP to placing the resultant contract on the Board Agenda is expected to be approximately 18 months.

LASD recommends a competitive bidding process as described in option #4 Request for Proposal, once the Board funds the BWC program accordingly. All vendors who qualify will be expected to meet the specified requirements, demonstrate their product and total solution, and will be tested during real-time demonstrations to clearly show their product meets the standards specified in the RFP.

It should be noted that if the Board of Supervisors accepts the Federal Grant award from the U.S. Department of Justice, they require a BWC rollout no later than two years after the grant award (October 2018).

Deployment Plan

The LASD has taken a measured and comprehensive approach to BWC implementation to allow for changes in technology and laws. LASD has developed a phased plan over four years.

Pre-Deployment Phase (Year 1)

The pre-deployment phase will focus on staffing, infrastructure, and procurement. Staffing will be for the creation of the body worn camera unit and will establish minimum staffing to develop the BWC program. Network and electrical infrastructure upgrades for each facility will begin with priority for the first six stations. The BWC unit will develop specifications, complete and publish a request for proposal (RFP), as directed by the Board of Supervisors.

The Pre-Deployment phase will also include the completion of the Department body worn camera policy, MOU agreements between county agencies, receipt of BJA grant, and completion of a formal training curriculum.

Phase I (Year 2)

Body worn cameras will be deployed to six patrol stations: Century, East Los Angeles, Lancaster, Lakewood, Palmdale, and West Hollywood. These six stations were specifically chosen to address the highest areas of risk potential (based the average over the last two years) and ensure inclusion of at least one station from each supervisorial district. The risk factors evaluated and included are:

- Number of calls for service and calls for observation
- Number of arrests
- Number of use of force incidents
- Number of shootings
- Number of vehicle pursuits
- Number of complaints

Each station will require installation of system hardware and training of personnel. The LASD will begin staffing increases of detectives, risk management sergeants, video specialists and digital evidence managers.

The remaining patrol station network and electrical infrastructure will be completed in preparation for Phase II. Body worn camera equipment installation for future phases will begin.

Phase II (Year 3)

Body worn cameras will be deployed at the remaining patrol stations. The additional 17 stations will already have infrastructure improvements and equipment installation will be in progress at the beginning of the phase.

Remaining specialized patrol station network and electrical infrastructure will be completed in preparation for Phase III. Body worn camera equipment installation for future phases will begin.

After the first six stations have been implemented with body worn cameras at least one year, and as data becomes available, LASD will begin a re-assessment to ensure continuous quality improvements.

Phase III (Year 4)

Body worn cameras will be deployed to all specialized patrol assignments (e.g., Transit Policing, Parks Bureau and other Countywide Patrol Divisions). Most, if not all, infrastructure and electrical improvements will be completed. Many specialized bureaus have small substations which will not require infrastructure improvements.

Additional Assumptions and Considerations

Body Worn Camera Solution Cost

In order to create a comprehensive cost estimate, LAPD's BWC agreement pricing was used in estimating LASD's costs for a total BWCS solution, since LAPD is in close proximity and similar in size to LASD. LASD realizes that over time camera and storage costs will continue to decline. However, it will be the County's competitive bid process results that will determine actual costs. LAPD's BWC professional services agreement is a total solution and offers the LAPD: BWCs and docking cradles (with a backup supply for repair exchange-out), a DEMS with unlimited data storage in a secure cloud, BWC equipment refresh at 30 months, and all necessary technical support. More detailed information, and the LAPD BWC Agreement document link is available at: http://clkrep.lacity.org/onlinecontracts/2016/C-127706_c_6-24-16.pdf

Based upon our review of LAPD's contract, LASD estimates that equipment costs for a BWC program will be approximately \$100 per deputy sheriff per month, equating to \$1,200 yearly per deputy. The following is an estimated cost breakdown per year for the BWCS equipment and software subscription costs:

Project Phase	BWCs Issued - Current Phase	BWCs Issued - Cumulative Total	Yearly Price Per Deputy	Annual Total
Phase I	1,417	1,417	\$ 1,200	\$ 1,700,400
Phase II	2,541	3,958	\$ 1,200	\$ 3,049,200
Phase III	1,937	5,895	\$ 1,200	\$ 2,324,400

Cumulative Total: \$ 7,074,000

Backfill Overtime for BWC Training

LASD will conduct BWC training for every deputy issued a BWC. LASD staffing levels will require backfill overtime for deputies to be trained on BWC policy and procedures. LASD calculates \$617.84 of backfill overtime needed for each deputy assigned to training (8 hours times \$77.23 per hour). The Department used Contract Law's Cost Model Overtime Rates (FY 2016-17) for a deputy sheriff bonus-1 as an estimate to determine backfill overtime costs over the three deployment years:

Project Phase	Number of Deputies	Overtime Amount per Deputy	Total
Phase I	1,298	\$ 617.84	\$ 801,956
Phase II	2,323	\$ 617.84	\$ 1,435,242
Phase III	1,894	\$ 617.84	\$ 1,170,189

Totals: 5,515 \$3,407,387

Public Records Act (PRA) Volume

Over the two year period of 2014 and 2015, the LASD handled approximately 2.17 million calls and made 2.87 million observation contacts, resulting in 121.4 million minutes on calls and 160 million minutes on observations. Based on this information, the LASD averages 2.518 million calls or observations per year and averages 140.35 million minutes on calls or observations, per year. This yields an average of 56 minutes in handling time for calls or observations.

In 2014, LASD received 516 PRA requests. Although some of these requests were not patrol related and would therefore not be related to BWC videos, we used this number as an estimate. By way of comparison, the Seattle Police Department, who operates under Washington State law, received approximately 4,000 PRA requests. Seattle Police Department had 1,600 sworn officers in 2014. Additionally, Seattle PD received 215,593 calls-for-service in 2014. Seattle Police Department had a PRA request rate of approximately 1.86% (4,000 PRA Requests / 215,593 calls).

Based on the Seattle Police Department formula, we can extrapolate the anticipated volume of work to redact public records requests. Given the volume of calls-for-service, the size of LASD, and the assumptions outlined, we will require one full-time position with the appropriate support personnel (such as supervision, operations support and IT support) for each Sheriff's station.¹ Based on each station's anticipated extra workload, the appropriate classification level for this position will be an Operations Assistant II. This non-sworn, supervisor-level

¹ Given that Seattle PD's PRA rate was approximately 1.86% for 2014, we can extrapolate LASD's PRA request rate accordingly. At 2,518,238 incidents (calls and observations) per year for the LASD and applying the 1.86% PRA rate factor along with an additional assumption that LASD will have only 25% the volume of Seattle PD given the legislative differences in public records, that leaves approximately 11,710 PRA requests (2,518,238 x 1.86% x 25%). With an average of 1 hour of video per call, that leads to approximately 11,710 hours of video. Estimating 4 hours of review and redaction per one hour of video equates to 46,840 hours of video review total. With 960 hours per full-time staff member allotted to review and redaction per year, that equates to 48.8 full time employees (46,840 / 960).

classification will conduct BWC-related duties, which include managing the daily operations of the DVMS software, PRA requests, metadata audits, video redaction, and records requests. We made the following assumptions in determining the above staffing estimates:

- The video review process and level of staff required, by incident type, are based on current LASD policy
- A conservative ratio of four hours of video redaction work for every hour of actual video. This is a very conservative estimate, as other external sources use much higher ratios for the same work effort
- On average, 56 minutes of original video requires redaction, for either a service call or an observation
- Staff performing redaction work will review all original videos in its entirety to determine what requires redaction
- On average, every staff performing redaction work will handle 960 hours of redaction per year, based on 45% of their workload and work duties assigned
- LASD will redact approximately 25% of Seattle PD's PRA request volume, based on Seattle PD's experience and based on the difference in California laws compared to those in Washington

Station Detectives

The station detective staffing requests are based on their existing workload and the anticipated workload BWC videos will generate.

For example, Lakewood Station field deputies spent an average of 17,271 hours a year on service calls involving arrests, based on the past two fiscal years of data. With each deputy recording BWC video, detectives will be required to review video pertinent to the case. A detective position yields approximately 1,789 hours a year performing detective duties. If the deputy expects to watch 25% of the video per case to be filed, Lakewood station alone requires three additional detectives to handle the anticipated BWC video. If policy were to require the entire video to be watched, Lakewood would need ten additional detectives (See appendix B). This calculation assumes a detective dedicates their entire workday to watching BWC video and does not account for other job functions. The data does not account for active investigations which do not yield an arrest. For more detailed information on individual station level impacts, see the chart in Appendix B.

Other factors for staffing consideration include:

1. Virtually every field deputy involved with handling or assisting in an arrest incident will have BWC video footage.
2. Detectives are required to review each video. They will also be viewing key footage multiple times by fast forwarding, rewinding, and replaying. The detective will bookmark

and insert key evidentiary notes in the videos using the DVMS, and must also verify the accuracy of the deputy's preliminary field report with the videos, addressing any variances.

3. Often times, field incidents involve multiple suspects and multiple deputies. The detective must link all the related BWC footage to each suspect's individual case, copying the video footage and bookmarking/inserting evidentiary notes as it relates to each suspect.
4. The detective will seek information in the video that either incriminates or exonerates a suspect. However, the video may also contain information that identifies other involved parties connected with the incident.
5. BWC video footage with significant evidentiary value may require additional video forensics.

Conclusion

The Department would like to thank the honorable Board of Supervisors for the opportunity to develop this body worn camera plan. In addition, the Department thanks the workgroup for their tireless efforts.

Appendix A – LASD Body Worn Camera Budget Summary



Body Worn Camera Deployment Summary

** Budget Figures for all Phases below are based upon the most recent FY 2017/2018 budget calculations obtained from LASD Fiscal and do not take into account raises and other cost increases (i.e., vehicles, leases) from FY 2018/2019 and beyond, nor unforeseen changes due to approved legislation and/or other policy changes.*

Pre-Deployment Phase (Year 1)

- 8 Personnel
- No BWCs deployed
- Establish Centralized BWC Unit, Station Power and Wiring Infrastructure, and Station Network Infrastructure
- Cost
 - One Time \$ 3.3 M
 - Ongoing* \$ 1.7 M
 - Total \$ 5.0 M

Phase I Deployment (Year 2)

- 88 Personnel
- 1,417 BWCs deployed
- 6 Stations, one in each Supervisorial District, with the greatest potential of liability based upon arrest and other factors – Lancaster, Palmdale, Lakewood, East Los Angeles, West Hollywood, and Century
- Cost
 - One Time \$ 4.7 M
 - Ongoing \$ 17.9 M
 - Total \$ 22.6 M

Phase II Deployment (Year 3)

- 193 Personnel
- 2,541 additional BWCs deployed, total 3,958 BWCs deployed
- All Patrol Stations (Specialized Patrol Excluded)
- Cost
 - One Time \$ 8.5 M
 - Ongoing \$ 23.9 M
 - Total \$ 32.4 M

Phase III Deployment (Year 4)

- 239 Personnel
- 1,937 additional BWCs deployed, total 5,895 BWCs deployed
- Remaining Patrol & All Specialized Patrol Operations
- Cost
 - One Time \$ 3.3 M
 - Ongoing \$ 11.7 M
 - Total \$ 15.0 M

ON-GOING PROGRAM COSTS: \$ 55.2 M (ANNUALLY)

*Ongoing costs (which include Personnel) are cumulative, one-time costs are not.

Appendix B –Investigative Support Chart

Calculated Needs Assessment for Investigator Support²

2-Year Average Impact on LASD Detectives for Fiscal Years 2014-2016*

Station	No. of Inv Needed for 2014-15 Video	No. of Inv Needed for 2015-16 Video	2-Year Average of Video Hours	No. of Inv Needed for 2-Yr Avg Video - All Incidents w/Arrest(s)	93.6% Cases to Station DB or OSS 2006-2007 Dept. Studies Avg.'s	Narco Est* Needs 2014-2016 Workload Studies	Other Detective Total Needed Minus Sta DB, Minus Narco
AVA	0.2	0.2	375	0.2	0.2	0	0.0
CAS	7.5	7.7	13,665	7.6	7.1	0.01	0.5
CCS	0.1	0.1	195	0.1	0.1	0	0.0
CEN	11.3	11.1	20,000	11.2	10.5	0.02	0.7
CER	1.5	1.4	2,681	1.5	1.4	0.01	0.1
CPT	7.8	7.6	13,816	7.7	7.2	0.00	0.5
CVS	2.4	2.2	4,163	2.3	2.2	0.00	0.1
ELA	11.8	10.5	19,960	11.2	10.4	0.01	0.7
IDT	9.0	8.8	15,979	8.9	8.4	0.04	0.5
LAN	12.1	11.1	20,747	11.6	10.9	0.02	0.7
LHS	3.9	3.6	6,689	3.7	3.5	0.02	0.2
LKD	10.0	9.3	17,271	9.7	9.0	0.01	0.6
LMT	1.4	2.0	3,089	1.7	1.6	0.00	0.1
MDR	1.2	1.0	1,977	1.1	1.0	0.00	0.1
NWK	7.4	7.1	12,928	7.2	6.8	0.03	0.4
OCS	0.3	0.3	497	0.3	0.3	0.00	0.0
OTH	0.5	0.3	697	0.4	0.4	0.00	0.0
PKB	2.3	2.2	4,028	2.3	2.1	0.00	0.1
PLM	10.2	9.0	17,113	9.6	9.0	0.03	0.6
PRV	6.5	5.5	10,675	6.0	5.6	0.00	0.4
SCT	7.0	6.2	11,802	6.6	6.2	0.02	0.4
SDM	3.8	3.1	6,122	3.4	3.2	0.00	0.2
SLA	7.0	6.0	11,634	6.5	6.1	0.00	0.4
TEM	8.7	8.3	15,169	8.5	7.9	0.01	0.5
TSB	18.1	12.8	27,660	15.5	14.5	0.01	1.0
WAL	3.4	3.4	6,063	3.4	3.2	0.01	0.2
WHD	4.5	5.0	8,510	4.8	4.5	0.00	0.3
All LASD	160	146	273,505	153	143	0.25	10

An explanation about the basis of these calculations is contained in the pages that follow.

Appendix C - Legal

BWC technology is outpacing changes in the law. Several body camera bills have been introduced in the California Legislature, however, only California Assembly Bill 69 has passed. According to California Assembly Bill 69, "This bill would require law enforcement agencies to consider specified best practices when establishing policies and procedures for downloading and storing data from body worn cameras, including, among other things, prohibiting the unauthorized use, duplication, or distribution of the data, and establishing storage periods for evidentiary and non-evidentiary data, as defined." This bill indicates evidentiary data should be retained for a minimum of two years, which the Department will comply. Also, when peace officers are using BWCs within the scope of their authority, they are exempt from existing laws which makes it a crime to record without the consent of all parties.

BWC policies must also comply with existing legal requirements. For example, Penal Code section 636 prohibits recordings of persons in custody of a law enforcement officer and that person's attorney, religious advisor, or licensed physician. Penal Code section 1054.1 states the prosecuting attorney shall disclose all exculpatory evidence, which would require law enforcement to produce any known videos on a criminal incident. Penal Code section 1054.2 provides exemptions to disclosure of certain information such as addresses or phone numbers of witnesses or victims, which would require redaction of videos to suppress that information.

The California Public Records Act was established prior to body worn camera use. LASD must comply with the California Public Records Act (CPRA). The Department has many records in its possession that, in whole or in part, are confidential by law. Requests for copies of video from BWC's present a unique challenge in determining whether the requested record is public or investigative in nature. Further challenges arise when confidential material is contained within the recording. (LVMPD.com, n.d.)

LASD will balance the interests of individuals who seek access to BWC records with individual privacy rights pursuant to the California Constitution and applicable confidentiality laws. The Department has requested staff to review public records requests and redact information when release is appropriate. Should legislation pass requiring all video to be released, LASD will not have enough staff available to comply with the anticipated increase of public records requests. It is imperative the Department ensure compliance with laws and public safety prior to releasing video.

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